IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WELLS FARGO BANK, N.A. AS)
TRUSTEE FOR THE POOLING AND)
SERVICING AGREEMENT DATED AS) Case No: 12-cv-08781
OF AUGUST 1, 2005 PARK PLACE)
SECURITIES, INC. ASSET-BACKED) Judge: James B. Zagel
PASS-THROUGH CERTIFICATES)
SERIES 2005-WHQ4,)
Plaintiff,)
)
v.)
)
VENTURA E. MELCHOR, et al.)
Defendants.)
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MOTION FOR ENTRY OF JUDGMENT OF FORECLOSURE NUNC PRO TUNC

NOW COMES the Plaintiff, WELLS FARGO BANK, N.A. AS TRUSTEE FOR THE POOLING AND SERVICING AGREEMENT DATED AS OF AUGUST 1, 2005 PARK PLACE SECURITIES, INC. ASSET-BACKED PASS-THROUGH CERTIFICATES SERIES 2005-WHQ4, by and through its attorney, Megan Christine Adams, and moves this Honorable Court for Entry of Judgment of Foreclosure Nunc Pro Tunc 3/29/2013. In support thereof, Plaintiff states as follows:

- 1. On November 2, 2012 Plaintiff filed its Complaint to Foreclose Mortgage.
- 2. On March 7, 2013 Plaintiff filed its Motions for Default Judgment which was granted on March 29, 2013.
- 3. For reasons unknown to new counsel, a Judgment of Foreclosure was never entered.
- 4. Therefore, Plaintiff seeks a judgment of foreclosure nunc pro tunc March 29, 2013 so that Plaintiff may proceed with the sale of this foreclosed property.

WHEREFORE, Plaintiff respectfully requests that a Judgment of Foreclosure be entered in this case, with a nunc pro tunc date of March 29, 2013, so that the Plaintiff can move forward with the sale of this foreclosed property. Upon filing of this motion, Plaintiff will provide a Judgment of Foreclosure that adheres to the affidavits on record.

Respectfully submitted,

/s/ Megan Christine Adams

Megan Christine Adams ARDC#6312221 Potestivo & Associates, P.C. 223 West Jackson Blvd, suite 610 Chicago, IL 60601 (312)263-0003